

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
V.) No. 16-10305-NMG
)
MARTIN GOTTESFELD,)
)
)
Defendant)

**DEFENDANT'S MOTION TO EXTEND TIME TO
FILE SUPPLEMENTARY MOTION TO SUPPRESS**

Defendant Martin Gottesfeld hereby moves this Honorable Court for an order extending the date by which he is to file a supplementary motion to suppress the search warrant herein from February 15 to March 12, 2018.

As reason therefore, undersigned counsel states that he has encountered extreme difficulty in identifying a qualified expert witness to review and analyze the extensive traffic captured from his various computers by the government's use of the pen register and trap & trace devices herein. Specifically, only after 14.5 hours searching for and communicating with potentially qualified expert witnesses and 10 hours researching relevant case law and technical information has he been able to identify and confirm an expert to perform the necessary review and analysis. Most of the approximately 15 candidates I contacted did not have the necessary skills to perform the required review notwithstanding that they all billed themselves as experts in computer forensics and analysis. The search was narrowed down to those with Cisco Certified

Motion denied as moot.

JRM Gorton, USDJ 2/21/18